

# EXHIBIT BB

DAVID ACKERMAN  
UNITED STATES vs STATE OF GEORGIA

August 31, 2022

1

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA

United States of America,  
Plaintiff,

No.  
1:16-CV-03088-ELR

vs.

State of Georgia,  
Defendant.

~~~~~

VIDEOTAPED DEPOSITION OF

DAVID ACKERMAN

AUGUST 31, 2022

8:49 a.m.

U.S. Attorney's Office, 22 Barnard Street, Suite 300  
Savannah, Georgia

Marcella Daughtry, RPR, RMR  
Georgia License No. 6595-1471-3597-5424  
California CSR No. 14315

DAVID ACKERMAN  
UNITED STATES vs STATE OF GEORGIA

August 31, 2022

54

1 A Okay.

2 Q Which you've been in since January of 2021,  
3 correct?

4 A That is correct.

5 Q So the resume references responsibilities  
6 relating to developing and maintaining a budget, State  
7 grant and strategic plan. Do you see that text?

8 A Yes.

9 Q What are your duties with respect to developing  
10 and maintaining the budget?

11 A Well, we -- we start off by submitting the  
12 application for the -- the State grant, and -- and then  
13 budgeting our -- our expenses for staff and so forth and  
14 expenses, and just working with our -- our -- just  
15 working on the regular -- you know, creating a budget  
16 with that.

17 Q What is the annual budget for CGCA?

18 A The -- the State grant was listed at 2.9  
19 million. I'm not sure of the exact. The federal grant  
20 was 315,000, and then we have our district that  
21 provides -- what's the word I'm looking for? I'm drawing  
22 a blank on the word.

23 Q Oh, that's fine.

24 Do you get additional funds from the district?

25 A Not financial but in support, in -- in kind.

DAVID ACKERMAN  
UNITED STATES vs STATE OF GEORGIA

August 31, 2022

118

1 Q How recently?

2 A Probably when we submitted the State grant.

3 Q Which was when; do you recall?

4 A We typically submit the State grant June.

5 Q June of 2022 is the last, and really the first  
6 time you submitted it?

7 A Correct. No, I was a part of the 2021.

8 Q 2021 as well?

9 A Yes.

10 Q Because you joined in January --

11 A That is correct --

12 Q -- as principal?

13 A -- yes.

14 Q Okay.

15 MR. DENNISON: And one point of correction. I  
16 think I provided misinformation, but I think my  
17 misinformation helped. I think it's called the district  
18 placement team, but it does -- it is typically triggered  
19 by a disciplinary or behavior-based challenge, but it's  
20 called district placement team.

21 MR. HOLKINS: Okay. Thank you for that, Brian.

22 Q BY MR. HOLKINS: To your knowledge, are there  
23 any State audits at any of the facilities where CGAC  
24 (sic) serves students?

25 A Not that I am aware of.